

EXHIBIT "L"

1 pretty clear cut, but the issue of damages or of an appeal
2 on Mr. Boehm's part. It's almost as if you're trying to
3 rehash the criminal aspect of things in an attempt to
4 undermine the grand jury.

5 I don't want to object, because I'm trying
6 to get a feel for where this is going. But so far it's
7 more of -- okay, you know, so -- well, let's let it go on
8 and see what happens. I don't see the link in the damages
9 yet, unless you're trying to undermine credibility of a
10 crack addict 15 year old at the time. That's fine if you
11 think that can happen, since a 15-year-old crack addict has
12 no credibility.

13 MR. KENNER: I'll stipulate to that. Do you
14 want to enter a stipulation that a 15-year-old crack addict
15 doesn't have credibility?

16 MR. JONES: I think you're missing the
17 point. What I'm saying is that a 15 year old that's been
18 addicted to crack cocaine by a 60-year-old man cannot be
19 expected to be totally coherent during the period of time
20 she's addicted to crack cocaine, so everything is in
21 question, everything is in question.

22 The question is did the grand jury -- did
23 the grand jury feel her testimony, along with other
24 people's, was credible enough to indict him, and they did.
25 Now everything that's been done -- and he's admitted to

1 like Josef did.

2 Q. So Bambi brings you to Josef and you get drugs?

3 A. Yes.

4 Q. And that's what you wanted from him, is that
5 correct? That's why you went there, was to get drugs?

6 A. Yes.

7 Q. And for whatever period of times you would stay
8 there you would stay there so that you could continue to
9 get drugs?

10 A. Yes.

11 Q. Now you have answered a number of questions this
12 morning that I asked you by saying that, for example, about
13 Mr. Boehm being the victim of Ms. Tyree and Mr. Bolling and
14 Mr. Williams, by saying that's what you believed when you
15 said those things in 2004. But am I correct in assuming
16 that you're saying you don't no longer feel that way?

17 A. No, I do not any longer feel that way.

18 Q. Between that time and now you have filed a civil
19 complaint, is that correct?

20 A. Yes, that is correct.

21 Q. And that civil complaint is for damages for money,
22 is that right?

23 A. Yes.

24 Q. Is the fact that you have filed a lawsuit for
25 money making various allegations that are different than

1 what you felt in 2004, the reason that you changed your
2 feeling?

3 A. The reason I filed the civil suit is because my
4 feelings changed.

5 Q. And your feelings changed because of what?

6 A. Because I've been sober for over two years now,
7 and I'm realizing that what Josef did to me was wrong.

8 I was 15 years old when I met him, okay.
9 When you start doing drugs, your brain stops growing. You
10 know, I did start using marijuana at 13, 14, so I had the
11 mentality of a very young child. This is a 60-year-old
12 man. He knew what he was doing regardless of the fact that
13 he was high or not.

14 Me being a child and getting high and doing
15 what I did, and not being very aware of my sexuality at 15
16 years old and doing this, because that was what he wanted,
17 and I enjoyed getting high, you know, I mean, that's not
18 right. And that's why I'm here filing a civil suit,
19 because I still suffer from it today. I have dreams about
20 smoking crack. I wake up holding my breath. And I
21 don't -- you know, it's difficult.

22 Q. The question to you is, what is it that -- I
23 understand that you have different feelings about smoking
24 crack now than you had when you were smoking it.

25 My question is, what has changed your

1 Q. When you were at home with your mother, was your
2 father living there?

3 A. Until I was 9.

4 Q. Were there police called to the house because of
5 assaults by your father on your mother?

6 A. Yes.

7 Q. I think I asked you this before, but I just want
8 to be sure. Your testimony is after the crack cocaine
9 experience with Carl Bucher, you never did crack cocaine
10 again until after you knew Josef Boehm?

11 A. Yes, that I recall. I don't remember smoking
12 crack that often before I met Josef. I met him maybe two
13 weeks after that incident, two or three weeks after that
14 incident.

15 Q. Did you meet him through Bambi Tyree?

16 A. Yes, I did.

17 Q. How did you meet Bambi Tyree?

18 A. She was at my house with my mother.

19 Q. Was she a friend of your mother's?

20 A. Yes.

21 Q. Was she supplying drugs to your mom? Was she her
22 dealer?

23 A. You know, I don't know. I know that she had given
24 drugs to my mom. I don't know that my mom had ever
25 boughten drugs from her.

1 A. 13. 12 or 13, I'm not positive.

2 Q. So this would be after you were in elem -- after
3 you were in middle school?

4 A. Yeah, after junior high started.

5 Q. And after the 8th grade did you change schools?

6 A. Yes, I went on to high school.

7 Q. What high school did you go to?

8 A. Service High School.

9 Q. And where is that?

10 A. Off Abbott Loop Road.

11 Q. What years were you there?

12 A. I was only there three months for my 9th grade
13 year.

14 Q. And why did you leave there after three months?

15 A. I left voluntarily.

16 Q. When you say you left voluntarily, was there an
17 incident that caused you to have to make that decision?

18 A. No. I didn't want to go to high school up in
19 Alaska anymore.

20 Q. So did you drop out of high school then?

21 A. Yes, I dropped out of Service.

22 Q. Did you go to a different high school?

23 A. Yes, I did.

24 Q. And what high school was that?

25 A. It was actually in Washington. Spokane,

1 A. Yes.

2 Q. And up to that, is it correct that the only drug
3 experience that you've had yourself was to occasionally
4 smoke marijuana?

5 A. Yes.

6 Q. Now when you went to Spokane, you went to school
7 there for this nine months, did you have any problems in
8 school there? Did you get in trouble for anything?

9 A. Not in junior high.

10 Q. Did you go to high school there?

11 A. Yes, I did.

12 Q. What high school did you go to there?

13 A. Central Valley.

14 Q. Did you get -- have any problems or get in any
15 trouble at Central Valley High School?

16 A. Yes, I did. I got suspended for suspected drug
17 use.

18 Q. And tell me about that. How did that come about?

19 A. There was a rumor going around school that I used
20 Ecstasy the weekend before.

21 Q. Who were you supposed to have used Ecstasy with?

22 A. I don't know, I didn't hear the rumor. I was just
23 suspended by the vice principal because of suspected drug
24 use.

25 Q. And do you know the name of the vice principal?

1 A. I don't remember it.

2 Q. Did you do anything to contest this suspension?

3 A. Can you --

4 Q. Did you try to fight the suspension and say, "It's
5 only a rumor"? Did you deny doing it?

6 A. No, I did not.

7 Q. What year was that?

8 A. 2001 -- or, I was 15. 2001.

9 Q. Did you smoke -- or use Ecstasy?

10 A. Yes, I did.

11 Q. So the rumor was true?

12 A. Yes.

13 Q. Who were you with when you used Ecstasy on that
14 occasion?

15 A. My roommate and a guy friend. I don't remember
16 his name.

17 Q. What was your roommate's name?

18 A. Tawney Jones.

19 Q. Can you spell that for us.

20 A. T-a-w-n-e-y J-o --

21 Q. Jones we have, thank you.

22 And was that the first time you used
23 Ecstasy?

24 A. Yes.

25 Q. And so at that point in your life you had smoked

1 want to ask if she ever drank alcohol.

2 BY MR. KENNER:

3 Q. Did you ever drink alcohol with your mother?

4 A. No.

5 Q. Did you ever drink alcohol with anybody?

6 A. Yes.

7 Q. Did you ever drink alcohol prior to you meeting
8 Mr. Boehm?

9 A. Yes.

10 Q. When was that, when did you start?

11 A. About the same time I started smoking marijuana.
12 So around 14, around that age. I'm not positive. It was
13 before Josef Boehm, but it was in junior high.

14 Q. Did you continue to drink on a somewhat regular
15 basis from that point?

16 A. No. I occasionally drank alcohol. Very few, you
17 know, times a month, if that. But I did not drink alcohol
18 on a regular basis.

19 Q. At some point did you live in a commune in Utah or
20 in Seattle?

21 A. What's a commune?

22 Q. A place where there were a whole group of people
23 living, a number of families living together.

24 A. No, not that I know of. I don't know exactly what
25 that is.

1 Q. I'm a little confused. I thought you got in
2 trouble when you were still with your aunt and uncle?

3 A. No. I got in trouble when I lived with Tawney.

4 Q. Then you got one paycheck from this place?

5 A. I don't even remember getting a paycheck from that
6 place, it was so long ago.

7 Q. So you don't have any recollection today of
8 whether you made any money at this job?

9 A. I know that I was getting paid \$9 an hour, and I
10 know that I worked there for a while.

11 Q. What's "a while"?

12 A. I'd say two or three weeks. I don't remember
13 exactly from date to date.

14 Q. Did you put these checks -- did you have a bank
15 account?

16 A. No.

17 Q. You cashed the checks someplace?

18 A. Yes.

19 Q. And you have no idea how much the checks were for?

20 A. I was 15 years old. I got money, I didn't care.
21 I went and bought clothes.

22 Q. Were you doing any drugs at that time?

23 A. No.

24 Q. Did you have a boyfriend at that time?

25 A. No.

1 Q. So your life is essentially uneventful, other than
2 this Ecstasy situation and going to this treatment
3 facility, until you come back to Alaska?

4 A. Yes.

5 Q. When you come back to Alaska who pays for your --
6 did you fly back?

7 A. Yes.

8 Q. Who pays for your ticket?

9 A. My mother.

10 Q. And did you move back in with your mother then?

11 A. Yes, I did.

12 Q. And how old were you at that time?

13 A. 15.

14 Q. Where did you live with your mother then?

15 A. 6650 Tiffany Terrace.

16 Q. Was your mother still using drugs?

17 A. Yes, she was.

18 Q. Do you know what kind of drugs she was using?

19 A. Crack cocaine.

20 Q. Using it on a regular basis?

21 A. Yes.

22 Q. Did you start using crack cocaine?

23 A. Yes, I did.

24 Q. Did you start using it initially with your mother?

25 A. Yes, I did.

1 Q. How old were you when you first started using
2 crack cocaine with your mother?

3 A. 15.

4 Q. And can you tell me what happened the first time?
5 How did your mother get you to use crack cocaine, or why
6 did she get you to do it, to your knowledge?

7 A. I heard her on the phone telling somebody that she
8 would meet them in a parking lot. I knew what she was
9 going to do. And all I wanted was to get along with my mom
10 again. You know, I wanted my mom back, so I told her I was
11 going with her. And she told me, no, I wasn't. And I got
12 in the car anyway. And we went down there, and that's
13 where I first took my first crack hit.

14 Q. Did you meet somebody there?

15 A. Yes.

16 Q. Who was that?

17 A. Carl Bucher.

18 Q. Did you develop a relationship with Carl Bucher?

19 A. At one point.

20 Q. At what point was that? How long after the time
21 that you first met him?

22 A. It was a matter of days. I don't even think it
23 was a week. I met him that day with my mother and took my
24 first crack hit with both of them. He got in the car, he
25 gave my mom drugs, and we started smoking some. And then

1 within that week I had smoked crack on two different
2 occasions, once with my mom and Carl, and another with
3 Carl.

4 Q. How old was Carl at that time?

5 A. I don't know.

6 Q. Was he more than 20?

7 A. Yes.

8 Q. More than 30?

9 A. I don't know.

10 Q. When you -- after that week, did you continue to
11 see him?

12 A. No.

13 Q. Was that the last time you saw him?

14 A. Not the last time I've ever seen him, but the last
15 time I used drugs with him.

16 Q. Did you ever have sex with Carl Bucher?

17 A. Yes, I did.

18 Q. When was the first time you had sex with Carl
19 Bucher?

20 A. The only time I had sex with Carl Bucher was
21 during that second event that I smoked crack with him.

22 Q. In the car?

23 A. No. The second time.

24 Q. Where was that?

25 A. At a hotel.

1 Q. Who was -- was it just you and Carl?

2 A. That I recall, yes.

3 Q. So you smoked crack with him and your mother in
4 the car. And then you meet him in a hotel?

5 A. He came to my house, and I left with him to go get
6 high and have fun.

7 Q. That was only the second time that you got high?

8 A. Uh-huh.

9 Q. Was that because you enjoyed it so much the first
10 time, getting high I mean?

11 A. Yeah. I didn't enjoy it so much, but I liked the
12 feeling.

13 Q. You liked it enough that you wanted to do it again
14 a few days later?

15 A. Yes.

16 Q. And did you know when you went to meet him that
17 you were going to go to a hotel?

18 A. No. He came to my house, I didn't go meet him.

19 Q. Did he tell you before you got to the hotel you
20 were going to the hotel?

21 A. No.

22 Q. So the next thing you know you're at a hotel?

23 A. No, not right away.

24 Q. At some point does he tell you, "We're going to go
25 to a hotel and have sex"?